# Exhibit 2

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

VISHVA DESAI, on behalf of herself and others similarly situated,

Plaintiff,
V.

No. 1:11-cv-1925

Judge Bucklo
Magistrate Judge Keys

ADT SECURITY SERVICES, INC., Defendant.

Defendant.

# AMENDED NOTICE OF TAKING DEPOSITION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)

PLEASE TAKE NOTICE that Third-Party Plaintiff, ADT Security Services, Inc. ("ADT"), will take the deposition(s) of the person(s) designated by the Elephant Group, Inc. ("Elephant"), pursuant to Federal Rule of Civil Procedure 30(b)(6), on May 9, 2014, at 9:00 a.m., before a notary public or other person authorized by law to administer oaths. The deposition shall take place at 301 NE 51<sup>st</sup> Street, #1240, Boca Raton, FL 33431. The deposition will be recorded by stenographic means and will continue from day to day until completed. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of the Court.

Elephant shall designate one or more officers, directors, managers or other persons who shall testify on behalf of Elephant, and Elephant shall designate about which of the matters described and enumerated below each person shall testify.

## **SUBJECTS OF INQUIRY**

- 1. The Agreement between Elephant and ADT.
- 2. Elephant/Saveology's marketing of ADT products and services.

- 3. Elephant/Saveology's sales of ADT products and services.
- 4. Elephant/Saveology's telemarketing compliance.
- 5. The relationship between Elephant/Saveology and Paramount Media Group ("Paramount"), including but not limited to how Elephant/Saveology decided to contract with Paramount, the agreement with Paramount, and monitoring and supervision of Paramount.
  - 6. Paramount's marketing of ADT products and services.
  - 7. Paramount's telemarketing compliance.
  - 8. The relationship between Elephant/Saveology and EMI, Inc.

#### McNEW P.A.

s/ C. Sanders McNew
C. Sanders McNew (pro hac vice)
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Counsel for ADT

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email on this 29<sup>th</sup> day of April 2014 on all counsel of record on the service list below.

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By: <u>s/ C. Sanders McNew</u>
C. Sanders McNew